



Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual Section 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: March 14, 2011
2. Name of company covered by this certification: N-1 Communications, LLC d/b/a HiBeam Internet & Voice
3. Form 499 Filer ID: 828220
4. Name of signatory: Marguerite (Peggy) Forrest
5. Title of signatory: Chief Administrative Officer
6. Certification:

I, Marguerite Forrest, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company

also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

The company also requests a waiver of the March 1, 2011 deadline associated with this filing as set forth in 47 C.F.R. §64.2009(e). Good cause exists for such a waiver. The company went into receivership in the last few weeks, and this change in status and personnel turnover have delayed the company's effort in completing the CPNI certification. The company believes, however, that this delay should not be deemed material for purposes of this certification. For convenience of FCC staff, a copy of the receivership order is submitted with this certification.

Signed , Chief Administrative Officer

Attachments: Accompanying Statement explaining CPNI procedures

CUSTOMER INFORMATION POLICY

To protect the proprietary and private information about our customers, N-1 Communications LLC d/b/a HiBeam Internet & Voice, for itself and all subsidiaries and affiliates, establishes this company policy regarding customer information:

1. All of the company's proprietary, secured data bases, including that containing customer information, are user-level login and password protected, and access to databases is limited to authorized personnel only. Passwords are to be changed routinely, and whenever an employee with access to such data bases leaves the company.
2. No customer information is to be removed from the company's offices by employees or others, unless required by authorized personnel to perform installation or maintenance service at the customer premise. This includes computer printouts, handwritten information or notes, copies of files or documents in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the company.
3. Employees are to closely guard customer lists, contact information, telephone numbers and all other customer information, both proprietary and public, to prevent any information from being removed from Company offices by non-employees either accidentally or intentionally.
4. The notes that a salesperson or technician may make about a customer must be input into the password protected customer data base (Sugar) and hand written notes must be shredded at a company office at the end of the business day. This information is to be shared only with the customer or authorized Company personnel.
5. Internal documents, notes made when customers call in, and anything containing customer names and telephone numbers must be input into the password protected customer data base and any paper documents generated pursuant to such customer shall be shredded at the end of the business day.
6. Each new customer is required to select and provide the company with certain non-public information that only the customer knows, such as a favorite pet's name, etc., which information is to be used for identification purposes. Upon contact with a customer, you must request that the customer confirm his/her identity by providing his/her pre-selected information before discussing any matter with the customer. A customer visits the company's retail local and requests access to CPNI, the customer must first present a valid photo ID matching the customer's account information.
7. Customer information is never to be used or disclosed to anyone, except as follows:
 - (a) to market the company's service offerings to which the customer already subscribes;
 - (b) to market the company's CPE, information services, and adjunct-to-basic services;
 - (c) to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;

- (d) to disclose all location information in emergency situations, as provided for under §§222(d)(4) & (f) of the Communications Act of 1934, as amended;
 - (e) to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
 - (f) to resolve specific customer questions about the customer's own account, arising in the course of a telephone conversation between that customer and company's service representative.
8. Disconnected or inactive customer files are to be retained electronically in the company's secured, password protected database for no more than 3 years. Disconnected or inactive customer files are not to be retained in paper form.
9. The Company has a notification process outlined to alert law enforcement, the FCC and affected customers in the event of a CPNI breach.
10. Appropriate disciplinary action will be taken for any violations of this policy.